



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**MAY 08 2003**

James Munyer, Treasurer  
Freeborn County Republicans  
1101 Foothills Circle  
Albert Lea, MN 56007

RE: MUR 5364

Dear Mr. Munyer,

On April 28, 2003, the Federal Election Commission found reason to believe that Olmsted County RPM and you, as treasurer, violated 2 U.S.C. § 434 of the Federal Election Campaign Act of 1971, as amended ("the Act."). See 2 U.S.C. § 433(a). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file as it pertains to the Committee and you, as treasurer. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that failing to register and report with the Commission is a violation of 2 U.S.C. § 434. You should take steps to ensure that this activity does not occur in the future.

You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) remain in effect, and that this matter is still open with respect to other respondents. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Dawn R. Jackson, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

A handwritten signature in cursive script, reading "Ellen L. Weintraub".

Ellen L. Weintraub  
Chair

Enclosure  
Factual and Legal Analysis

cc: Rod Grams

**FEDERAL ELECTION COMMISSION  
FACTUAL AND LEGAL ANALYSIS**

**RESPONDENTS:** Freeborn County Republicans, and  
James Munyer, as Treasurer

**I. INTRODUCTION**

The Commission audited Rod Grams for U.S. Senate and Christine Grams, as Treasurer, (the "Committee") pursuant to 2 U.S.C. § 438(b). *See* Attachment 1.

**II. FACTUAL AND LEGAL ANALYSIS**

Based on the factual and legal analysis contained in the audit referral, a copy of which is attached, the Respondent expended \$1,900 for contributions to the Committee during the 2000 Primary Election and failed to register and report with the Commission. The Commission found reason to believe that the Freeborn County Republicans, and James Munyer, as Treasurer, violated 2 U.S.C. §§ 433(a) and 434 by failing to register and report as a political committee.